

Pursel, Brandon

From: Stephen A. Vetere <vetere@mabbett.com>
Sent: Tuesday, March 2, 2021 1:04 PM
To: Pursel, Brandon
Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Categories: Record Saved - Shared

Glad to help.

Thanks,
Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President of Operations

Mabbett & Associates, Inc.

Scientists | Engineers | Program Managers
105 Central Street, Suite 4100, Stoneham, MA 02180
Office: 781-275-6050 Ext. 312
Mobile: 617-285-0640

From: Pursel, Brandon <pursel.brandon@epa.gov>
Sent: Tuesday, March 2, 2021 2:01 PM
To: Stephen A. Vetere <vetere@mabbett.com>; Wong, Edmund <Wong.Edmund@epa.gov>
Cc: Steinberg Paul <steinberg@mabbett.com>; Humpherys, Heather [USA] <Humpherys_Heather@bah.com>
Subject: *EXTERNAL* RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

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Thanks Steve, this is very helpful.

Brandon Pursel
(312) 353-9229

From: Stephen A. Vetere <vetere@mabbett.com>
Sent: Monday, March 1, 2021 4:00 PM
To: Pursel, Brandon <pursel.brandon@epa.gov>; Wong, Edmund <Wong.Edmund@epa.gov>
Cc: Paul Steinberg <steinberg@mabbett.com>; Humpherys, Heather [USA] <Humpherys_Heather@bah.com>
Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Brandon,

Regarding the groundwater to surface water discharge, our reviewers from Booz Allen believe these issues were resolved in 2015 and 2016 when reviewing the May 2016 Pre-Design Work Plan (Revision 1) and, specifically, its

Attachment 3 – Technical Memorandum: Estimated Groundwater Discharge to Surface Water Dilution Factor. We still believe that ArcelorMittal's argument was satisfactory and conservative, and that this issue does not impact the recent conclusions from their remedy proposal.

As far as the treatment technologies, Mabbett and Booz Allen agree that both SER and ISTR are potentially viable at the site. In general, we are a proponent of thermal treatment options. However, as EPA notes, ISTR would need to go through pilot testing to ensure that any problems are identified and resolved (if possible) prior to full-scale implementation. There are also challenges relating to worker safety risks and potential loss of volatilized contaminants to the ambient environment. SER has already been through the pilot study phase, and the anticipated effectiveness of the two options is similar. The use of energy resources for ISTR is very intensive and that option is rarely considered the most environmentally friendly in terms of carbon footprint. Given these considerations, we would want to have more compelling reasons to push the option that is considerably higher in cost.

We are available to talk further about either of these issues if needed.

Thanks,
Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President of Operations

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From: Pursel, Brandon <pursel.brandon@epa.gov>

Sent: Thursday, February 25, 2021 11:37 AM

To: Stephen A. Vetere <vetere@mabbett.com>; Wong, Edmund <Wong.Edmund@epa.gov>

Cc: Steinberg Paul <steinberg@mabbett.com>; Humpherys, Heather [USA] <Humpherys_Heather@bah.com>

Subject: *EXTERNAL* RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

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Hi Steve, following up on your review.

- Would you be able to weigh in on your view regarding ArcelorMittal/Cleveland-Cliffs' position on the groundwater to surface water discharge issue at along the canal? My reading of your letter suggests that you don't feel it changes the conclusion regarding their remedy proposal.
- Regarding their preferred remedy (SER), does Mabbett have a position on this? Both SER and ISTR appear to be effective. SER has the distinction of having a pilot study done and the anticipated effectiveness isn't substantially lower than ISTR, and is also much more inexpensive over 7 years. However, given there are no plans to address the dissolved-phase constituents and given that free-product recovery doesn't usually directly address groundwater, in addition to the GW/SW interface, ISTR seems like an equally viable option. The corrective action group doesn't have a lot of experience with ISTR, so the effectiveness can't be adequately evaluated against other sites.

This may be too much to put in an email, so would be willing to jump on a call to discuss this with the group if preferred.

Thanks!

Brandon Pursel | Project Manager

U.S. EPA - Region 5 | Land, Chemicals & Redevelopment Division | RB Corrective Action Section 3
77 W. Jackson Blvd (LR-16J) | Chicago, IL 60604 | Office: 312.353.9229

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From: Stephen A. Vetere <vetere@mabbett.com>

Sent: Tuesday, February 23, 2021 10:57 AM

To: Wong, Edmund <Wong.Edmund@epa.gov>; Pursel, Brandon <pursel.brandon@epa.gov>

Cc: Paul Steinberg <steinberg@mabbett.com>; Humpherys, Heather [USA] <Humpherys_Heather@bah.com>

Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Brandon, Edmund,

Please see the attached letter providing the findings of our review of the RSR (Revision 2) for the Former Coke Plant.

Thanks,
Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President of Operations

Mabbett & Associates, Inc.

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From: Wong, Edmund <Wong.Edmund@epa.gov>

Sent: Thursday, January 28, 2021 2:15 PM

To: Stephen A. Vetere <vetere@mabbett.com>; Pursel, Brandon <pursel.brandon@epa.gov>

Subject: *EXTERNAL* RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

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Hi Steve,

The estimates looks good to me. Please proceed as planned.

Thanks,
Edmund

From: Stephen A. Vetere <vetere@mabbett.com>

Sent: Thursday, January 28, 2021 12:06 PM

To: Pursel, Brandon <pursel.brandon@epa.gov>

Cc: Wong, Edmund <Wong.Edmund@epa.gov>

Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Edmund,

The following is a summary of our estimate to evaluate the issues identified by Brandon and review the completeness of the responses and the revised Remedial Study Report for the Former Coke Plant:

Labor Category	Hours	Rate	Cost
Project Manager	Non-Responsive CBI	Non-Responsive CBI	Non-Responsive CBI
Expert Scientist	Non-Responsive CBI	Non-Responsive CBI	Non-Responsive CBI
TOTAL	Non-Responsive CBI		Non-Responsive CBI

We should have the SSPA document follow-up review completed by end of week, ready for submittal on Monday.

Thanks,
Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President of Operations

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From: Pursel, Brandon <pursel.brandon@epa.gov>

Sent: Thursday, January 14, 2021 11:36 AM

To: Stephen A. Vetere <vetere@mabbett.com>

Cc: Wong, Edmund <Wong.Edmund@epa.gov>

Subject: *EXTERNAL* RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

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Hi Stephen, at long last ArcelorMittal submitted a response to the comments I provided several months ago. Some key points:

- In the response, they explicitly state they are not intending to treat dissolved phased constituents and instead rely on NSZD or some other mechanism.
- They don't seem to agree with our stance regarding the groundwater/surface water interface, however this is not new. Francie knows a bit about this. The approach has been heading in the "agree to disagree"

direction provided they acknowledge the need to remediate. This of course has implications regarding agreed upon cleanup goals.

- Similar to the SSPA, a more detailed break-down of the costs and the assumptions that went into them didn't seem necessary just yet.

EPA's asking if you can take a look at this as well and provide thoughts/comments as well. Edmund will likely need an estimate like the SSPA.

Brandon Pursel | Project Manager
U.S. EPA - Region 5 | Land, Chemicals & Redevelopment Division | RB Corrective Action Section 3
77 W. Jackson Blvd (LR-16J) | Chicago, IL 60604 | Office: 312.353.9229

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From: Stephen A. Vetere <vetere@mabbett.com>
Sent: Wednesday, August 12, 2020 10:18 AM
To: Pursel, Brandon <pursel.brandon@epa.gov>
Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Brandon,

Sounds good. Thanks.

Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President, Environment, Engineering, and Infrastructure

Mabbett & Associates, Inc.

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105 Central Street, Suite 4100, Stoneham, MA 02180
Office: 781-275-6050 Ext. 312
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From: Pursel, Brandon <pursel.brandon@epa.gov>
Sent: Wednesday, August 12, 2020 11:00 AM
To: Stephen A. Vetere <vetere@mabbett.com>
Subject: RE: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Thanks Stephen. I am getting through this and will follow-up if I have any questions. I plan on getting a comment letter to them either this week or early next week.

I sent a comment letter to ArcelorMittal based on your SSPA comments, and I am going to have a call with their consultants about those comments soon. I don't think I'll need you on the call, but if that changes I'll let you know.

Cheers,

Brandon Pursel | Project Manager
U.S. EPA - Region 5 | Land, Chemicals & Redevelopment Division | RB Corrective Action Section 3
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From: Stephen A. Vetere <vetere@mabbett.com>
Sent: Wednesday, August 05, 2020 2:23 PM
To: Pursel, Brandon <pursel.brandon@epa.gov>; Wong, Edmund <Wong.Edmund@epa.gov>
Cc: Topp, Natalie <Topp.Natalie@epa.gov>; Paul Steinberg <steinberg@mabbett.com>; Humpherys, Heather [USA] <Humpherys_Heather@bah.com>
Subject: 68HERH19D0019/68HE0520F0058 - Technical Review of RSR for the Former Coke Plant - ArcelorMittal Indiana Harbor West (R7065000.006.001.003)

Brandon,

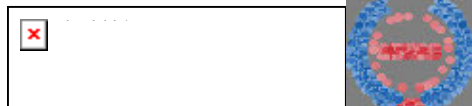
Please find our review comments on the April 2020 Remedial Study Report for the Former Coke Plant attached to this email.

Thanks,
Steve

Stephen A. Vetere, PE, LSP, LEP
Vice President, Environment, Engineering, and Infrastructure

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